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Application granted. The parties are directed to upload a proposed revised Civil Case Discovery Plan and Scheduling Order in accordance with the Court's Individual Practices by 5:00 p.m. on April 11, 2023.

The Clerk of Court is respectfully requested to terminate the motion sequence pending at Doc. 50

SO ORDERED.

Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
April 7, 2023

April 6,

**Via ECF**

Hon. Philip M. Halpern, U.S.D.J.  
United States District Court  
Southern District of New York  
300 Quarropas Street, Room 539  
White Plains, New York 10601

**RE: *Pirinea v. Westchester Dental, P.C. et al.***  
**SDNY Case No.: 22-cv-04807(PMH)**

***Moreno v. Westchester Dental, P.C. et al.***  
**SDNY Case No.: 22-cv-09977 (PMH)**

Dear Judge Halpern:

This firm represents the Defendants in the above-referenced matters. Defendants submit this letter in accordance with Your Honor's Individual Rule 1(C), requesting a modification to the Scheduling Order dated March 14, 2023 ([Dkt. # 48](#)).

The Scheduling Order sets the following dates for both actions:

- Completion of non-expert discovery due by April 21, 2023;
- Plaintiff's expert disclosures due by May 8, 2023;
- Defendants' expert disclosures due by May 22, 2023; and
- Completion of all discovery by June 8, 2023.

Defendants propose the following modified schedule for both actions:

- Completion of non-expert discovery due by June 9, 2023;
- Plaintiff's expert disclosures due by June 30, 2023;
- Defendants' expert disclosures due by July 14, 2023; and
- Completion of all discovery by August 4, 2023.

The request is made because when the undersigned conferred with counsel for the plaintiffs in both actions to request a modification to the original scheduling order the undersigned mistakenly utilized the wrong dates for his children's spring break. Upon learning of the correct dates it was clear to the undersigned that the completion of discovery by April 21, 2023 would not be possible. The undersigned raised this issue at the Court's March 30, 2023, discovery conference.

Moreover, pursuant to the Court's rulings at the March 30, 2023, discovery conference ([Dkt. # 49](#)) the parties are conferring on a protective order necessary for the continued exchange of discovery documents relating to patient records. The parties will continue to confer on discovery production to enable the scheduling of depositions.

Counsel for both plaintiffs has extended the courtesy of consenting to this proposed modified schedule.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Michael J. Mauro

cc: all counsel of record (via ECF)